UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE AT KNOXVILLE, TENNESSEE

PAMELA C. PHIBBS,

Plaintiff

vs.

REVENUE RECOVERY CORPORATION & BUFFALOE & VALLEJO, PLC,

Defendants

No. 3:16-cv-00156
(Phillips/Guyton)

DEFENDANT REVENUE RECOVERY CORPORATION'S MOTION FOR PROTECTIVE ORDER

Pursuant to Federal Rule of Civil Procedure 26(c)(1)(G), Defendant Revenue Recovery Corporation ("RRC") respectfully moves this Honorable Court for an order permitting it to produce confidential business documents – specifically RRC's internal policies and procedures for handling accounts connected to a bankruptcy filing, handling direct consumer disputes, handling indirect consumer disputes, credit reporting and furnishing credit information, and legal action on placed accounts – subject to appropriate limitations on disclosure to persons other than the parties, counsel of record and the Court, in order to preserve the confidential nature of the documents. Prior to the submission of this Motion, counsel for RRC provided a copy of this Motion and accompanying materials to Plaintiff Pamela Phibbs' ("Plaintiff") counsel in an attempt to obtain their assent to this Motion. Plaintiff's counsel has advised they oppose the Motion.

The reasons for this Motion are set forth more fully in the attached Memorandum.

Respectfully submitted,

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Counsel for Defendant Revenue Recovery Corporation

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and exact copy of the foregoing document has been served this 25th day of January, 2017, upon all counsel or parties as listed below at interest in this cause by delivering a true and exact copy to the offices of said counsel or parties or by placing a copy in the United States mail addressed to said counsel or parties at his/her office, with sufficient postage to carry it to its destination, or by special overnight courier; if the foregoing document has been electronically filed with the Court, this service has been made only upon counsel or parties to whom the Court does not furnish electronic copies of filings.

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